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Keith Stafford

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF CALIFORNIA

KEITH STAFFORD, an individual,  
Plaintiff,  
v.  
UNITED TREASURES, INC., a Washington  
corporation,  
Defendant.

CASE NO. CIV S-04-0047 FEB PAN

**JOINT STIPULATION BY PARTIES TO  
ADDITIONAL UNDISPUTED FACTS  
CONCERNING CORRESPONDENCE;  
REQUEST TO ADD TO CURRENT  
UNDISPUTED FACTS; PROPOSED  
ORDER ON STIPULATION**

Trial:

Date: October 4<sup>th</sup>, 2005

Time: 9 a.m.

Courtroom: 10

Plaintiff Keith Stafford, through his counsel Stephen L. Davis of Davis & Leonard LLP, and defendant United Treasures, Inc., through its counsel Ropers Majeski Kohn & Bentley, hereby submit this stipulation to additional undisputed facts for the trial in this matter.

The parties hereby stipulate that the undisputed facts set forth below as paragraphs 1 through 7 should be added to the undisputed facts set forth in section II of the final pretrial order, and that they should be accepted as undisputed for purposes of trial and may be read by either of the parties to the jury as provided in the final pretrial order.

1           The parties further request, in the interest of justice and in the interest of avoiding  
2 unnecessary consumption of the court's time and the jury's time, that the court grant this  
3 stipulation and allow these undisputed facts to be added to the undisputed facts contained  
4 in section II of the final pretrial order dated June 21, 2005.

5           1.       Ronald St. Marie and Thomas Chan are attorneys with the law firm of the  
6 Chan Law Group and have represented the defendant United Treasures, Inc. as its  
7 attorneys since at least December 1, 2003.

8           2.       Stephen L. Davis is an attorney with the law firm of Davis & Leonard LLP  
9 and has represented the plaintiff Keith Stafford as his attorney since at least December 12,  
10 2003.

11          3.       Keith Stafford's attorney, Stephen L. Davis, sent the letter marked as  
12 Plaintiff's Exhibit 93 in the mail on or about December 12, 2003 to the Chan Law Group,  
13 and this letter was received in the mail by the Chan Law Group.

14          4.       United Treasures, Inc.'s attorney, Ronald St. Marie, sent the letter marked  
15 as Plaintiff's Exhibit 94 in the mail on or about December 15, 2003 to Stephen L. Davis,  
16 and this letter was received in the mail by Stephen L. Davis.

17          5.       Keith Stafford's attorney, Stephen L. Davis, sent the letter marked as  
18 Plaintiff's Exhibit 104 in the mail on or about January 8, 2004 to Thomas Chan of the  
19 Chan Law Group, and this letter was received in the mail by Thomas Chan.

20          6.       United Treasures, Inc.'s attorney, Ronald St. Marie, sent the letter marked  
21 as Plaintiff's Exhibit 105 in the mail on or about January 28, 2004 to Stephen L. Davis,  
22 and this letter was received in the mail by Stephen L. Davis.

23          5.       Keith Stafford's attorney, Stephen L. Davis, sent the letter marked as  
24 Plaintiff's Exhibit 106 in the mail on or about January 29, 2004 to Ronald St. Marie of the  
25 Chan Law Group, and this letter was received in the mail by Ronald St. Marie.

26          6.       Keith Stafford's attorney, Stephen L. Davis, sent the letter marked as  
27 Plaintiff's Exhibit 110 in the mail on or about August 16, 2004 to Ronald St. Marie of the  
28 Chan Law Group, and this letter was received in the mail by Ronald St. Marie.

7. United Treasures, Inc.'s attorney, Ronald St. Marie, sent the letter marked as Plaintiff's Exhibit 111 in the mail on or about September 9, 2004 to Stephen L. Davis, and this letter was received in the mail by Stephen L. Davis.

SO STIPULATED.

Dated: August 24, 2005.

DAVIS &amp; LEONARD, LLP

/s/ Stephen L. Davis  
Stephen L. Davis  
Attorneys for Plaintiff Keith Stafford

Dated: August 24, 2005.

ROBERS, MAJESKI, KOHN, &amp; BENTLEY

/s/ Elise Vasquez  
Elise Vasquez  
Attorneys for Defendant United  
Treasuries, Inc.

ORDER

IT IS ORDERED THAT this stipulation is approved and the facts set forth in paragraphs 1 through 7 shall be deemed undisputed for trial and may be read to the jury as set forth in the final pretrial order dated June 21, 2005.

DATED: September 22, 2005

/s/ Garland E. Burrell, Jr.  
GARLAND E. BURRELL, JR.  
United States District Judge